

**Federal Defenders  
OF NEW YORK, INC.**

Southern District  
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September 26, 2022

**MEMORANDUM ENDORSED**

**BY ECF**

The Honorable Gregory H. Woods  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, New York 10007

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| USDC SDNY<br>DOCUMENT<br>ELECTRONICALLY FILED<br>DOC #: _____<br>DATE FILED: <u>9/26/2022</u> |
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Re: **United States v. Alpha Shaban**  
**21 Cr. 314 (GHW)**

Dear Judge Woods,

On behalf of Alpha Shaban I write to request permission for him to travel to Accra, Ghana, for the funeral of his paternal uncle, Sheikh Imam Ben Omar Shaban. The funeral is currently scheduled for September 29, 2022, see Ex. A. I request that Mr. Shaban be permitted to attend the funeral proceedings and remain in Ghana until October 29, 2022 to oversee the settling of his Uncle's affairs.

Mr. Shaban was raised by his uncle, who was the patriarch of the family. The title of family patriarch now passes to Mr. Shaban with his Uncle's passing. One of Mr. Shaban's duties as the new patriarch of his family will be to preside over the funeral proceedings on behalf of his uncle. Given Mr. Shaban's limited financial means, his family will cover the financial costs of his travel and lodging in Accra, Ghana.

Mr. Shaban has been in the community on Supervised Release since April 12, 2022, after serving an 11-month sentence for Conspiracy to Commit Bank and Wire Fraud. He is supervised by Probation Officer Jessica Dickson in the District of Connecticut. Mr. Shaban has done well on supervised release. He has not tested positive for any illegal substances. He has not been rearrested and has remained compliant with the law. Mr. Shaban works as a delivery person with Brasil Printing Corporation. He earns \$18 per hour and works approximately 30-35 hours a week. Mr. Shaban's employer is aware of the passing of his uncle and will permit him to travel for the funeral and to settle his uncle's affairs.

Mr. Shaban's probation officer objects to Mr. Shaban's travel unless he submits a large payment towards restitution and submits updated paystubs. The Government joins Probation in opposing this request.

I ask that the Court permit Mr. Shaban's travel despite these objections based on Mr. Shaban's financial status. As noted above, Mr. Shaban has not had any other issues on supervised release. Moreover, Mr. Shaban has every incentive to return to the United States and continue supervised release. He lives in Connecticut with his wife, Edna Rogers, and their three minor children. They will all remain in the United States while Mr. Shaban travels for his uncle's funeral.

For the reasons above, I ask that the Court grant Mr. Shaban permission to travel outside of his district of residence to Accra, Ghana. Mr. Shaban would provide his Probation Officer with his itinerary and travel arrangements prior to travel.

Respectfully submitted,

/s/ \_\_\_\_\_

Zawadi Baharanyi

Assistant Federal Defender

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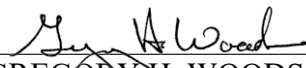
CC: AUSA Christy Slavik

Application granted. The conditions of Mr. Shaban's supervised release are modified as follows: Mr. Shaban may travel from the United States to Ghana during the period from September 27, 2022 through October 29, 2022. No intervening travel is permitted by this order. The defendant must provide his probation officer with a detailed itinerary and contact the probation office no later than one day following his return to the United States. All other conditions of the defendant's supervised release remain in full force and effect. For the avoidance of doubt, this order only modifies the conditions of Mr. Shaban's supervised release; it is not intended to have any other effect.

The Clerk of Court is directed to terminate the motion pending at Dkt. No. 87.

SO ORDERED.

Dated: September 26, 2022  
New York, New York

  
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GREGORY H. WOODS  
United States District Judge